

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF
AMERICA,

Plaintiff-Appellee,

No. 23-4650

Dist. Ct. No. 21-cr-460
District of Maryland

v.

SAMUEL SULLIVAN, JR.,

Defendant-Appellant.

**APPELLANT’S UNOPPOSED THIRD MOTION TO EXTEND
BRIEF AND APPENDIX DEADLINES AND
FOR REVISED BRIEFING ORDER**

Defendant-Appellant Samuel Sullivan, Jr. (“Appellant”), through counsel and pursuant to Local Rule 31(c), files this unopposed motion requesting that the Court extend by 30 days the deadline for his opening Brief and Appendix, and issue a revised Briefing Order extending the various other dates by 30 days, as well. In support, Appellant states:

1. This Court on February 23, 2024 granted Appellant’s unopposed motion and extended the deadline for his opening brief and

appendix by 30 days, to and through Monday, April 1, 2024. Dkt. event 13.

2. Undersigned appointed CJA counsel is a solo practitioner, and for much of March to date has been occupied responding to a set of emergency appellate filings in another matter pending in the Michigan Court of Appeals and Michigan Supreme Court. As a result, counsel will be unable to research, prepare and file the brief in this matter by the current April 1 deadline. Accordingly, good cause exists for an extension and Appellant requests a 30-day extension of his deadline for the Brief and Joint Appendix, to and through Wednesday, May 1, 2024, to give Appellant's counsel sufficient time to prepare and file papers that fully assist this Court in its task of appellate review.

3. Pursuant to Local Rule 27(a), counsel for Appellant has informed counsel for the United States via email of the intended filing of this motion. The United States does not oppose the relief requested and does not intend to file a response in opposition.

WHEREFORE, Appellant Samuel Sullivan, Jr. respectfully requests that the Court grant this Motion and issue a Revised Briefing Order setting a new deadline for his opening Brief and Joint Appendix

of May 1, 2024, and adjusting the subsequent deadlines an equal number of days.

Respectfully submitted,

/s/ Michael F. Smith

Michael F. Smith

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Samuel Sullivan, Jr.

Dated: March 25, 2024